

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED
STATES VIRGIN ISLANDS,

No. 22-cv-10904-JSR

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

JPMORGAN CHASE BANK, N.A.’S NOTICE OF MOTION TO DISMISS

Pursuant to Rule 12(b)(1) and Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant JPMorgan Chase Bank, N.A., hereby respectfully requests that the Court dismiss all claims in the Complaint. The reasons in support of Defendant’s Motion are set forth in the attached Memorandum of Law. Pursuant to this Court’s January 11, 2023 minute order, these “[i]nitial moving papers for [Defendant’s] motion to dismiss” are submitted “no later than 2/1/2023.” Pursuant to the same minute order, Plaintiff’s memorandum in opposition is due by February 15, 2023, and Defendant’s reply memorandum is due by February 22, 2023. *Id.*

Dated: February 1, 2023

Respectfully submitted,

**WILMER CUTLER PICKERING
HALE AND DORR LLP**

/s/ Felicia H. Ellsworth

Felicia H. Ellsworth

John J. Butts

60 State Street

Boston, MA 02109

(t) (617) 526-6000

(f) (617) 526-5000

felicia.ellsworth@wilmerhale.com

john.butts@wilmerhale.com

Boyd M. Johnson III
Robert L. Boone
Hillary Chutter-Ames
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(t) (212) 230-8800
(f) (212) 230-8888
boyd.johnson@wilmerhale.com
robert.boone@wilmerhale.com
hillary.chutter-ames@wilmerhale.com

Ronald C. Machen
2100 Pennsylvania Avenue NW
Washington, DC 20037
(t) (202) 663-6000
(f) (202) 663-6363
ronald.machen@wilmerhale.com

Attorneys for JPMorgan Chase & Co.